



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Huhtamaki, Inc.  
Kennebec County  
Waterville, Maine  
A-416-70-H-A**

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Amendment #2**

**FINDINGS OF FACT**

After review of the Part 70 License amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.) §344 and §590, the Maine Department of Environmental Protection (the Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Huhtamaki Inc.
LICENSE TYPE	Part 70 Significant License Modification
NAICS CODES	322299
NATURE OF BUSINESS	Converted Paper Product Manufacturing
FACILITY LOCATION	242 College Avenue, Waterville, Maine

Huhtamaki, Inc. (Huhtamaki) operates a molded pulp products manufacturing facility consisting of fiber processing, forming, drying, and laminating operations, together with boilers and other associated equipment.

Huhtamaki has the potential to emit more than 100 tons per year (TPY) each of sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>); therefore, the source is a major source for these criteria pollutants. Huhtamaki does not have the potential to emit more than 10 TPY of a single hazardous air pollutant (HAP) or more than 25 TPY of combined HAP; therefore, the source is an area source for HAP.

**B. Emission Equipment**

The following emission unit is addressed by this Part 70 License Amendment:

<u>Equipment</u>	<u>Max. Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Year of Installation</u>	<u>Stack #</u>
Boiler #5	71.3	69.9 Mscf/hr	natural gas	1966	3
	64.8	432 gal/hr	#6 fuel oil, 1.7% S		

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### C. Application Classification

Huhtamaki has requested the amendment of their air emission license to align the emissions testing requirement specified for particulate matter (PM) emissions from Boiler #5 with the testing requirement specified for nitrogen oxides (NO<sub>x</sub>). This application does not include the licensing of increased emissions; however, alteration of the frequency of required emissions testing could be considered a relaxation of testing and reporting license terms or conditions.

The application is not considered a Part 70 Administrative Revision or Part 70 Minor License Modification; thus, the requested amendment is considered to be a Part 70 Significant License Modification processed under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (CMR) 140 (as amended).

## II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in 06-096 CMR 100 (as amended).

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

### B. Amendment Description

Huhtamaki fires natural gas in Boiler #5 and may also fire #6 fuel oil as a back-up fuel. Huhtamaki has proposed that the frequency of required PM emissions testing be reduced from once every two calendar years to a testing frequency dependent on #6 fuel oil use, as follows: Huhtamaki shall perform PM emissions testing on Boiler #5 firing #6 fuel oil within 12 months of firing #6 fuel oil in Boiler #5 for greater than 50% of the boiler's annual total heat input, on a 12-month rolling total basis. Records shall be maintained and updated monthly for Boiler #5 documenting the heat input from each fuel, the total heat input, and the percentage of the total heat input from #6 fuel oil for the previous 12-month period.

Based on the use of natural gas as the primary fuel in Boiler #5 and lower emissions from firing natural gas compared to those from #6 fuel oil, Huhtamaki's previous emissions testing results showing consistent compliance with applicable emission limits, and other BPT determinations for similar units,

the Department finds that the proposed frequency of emissions testing satisfies BPT for Boiler #5. [06-096 CMR 140, BPT]

### C. Facility Annual Emissions

Total licensed annual emissions for the facility will not change as a result of this license amendment.

## III. AMBIENT AIR QUALITY ANALYSIS

Huhtamaki previously submitted an ambient air quality analysis, as part of Air Emission License A-416-70-A-I (January 14, 2002), demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Part 70 license amendment.

## ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License Amendment A-416-70-H-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the conditions found in Air Emission License A-416-70-D-R, in license amendment A-416-70-G-A, and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

## SPECIFIC CONDITIONS

Upon issuance of this Part 70 air emission license amendment, the following Specific Condition (16), Parts C and E shall replace Specific Condition (16), Parts C and E of Air Emission License A-416-70-D-R (October 9, 2012).

### (16) Boiler #5

#### C. Emission Limits

Emissions from Boiler #5 shall not exceed the following limits when firing #6 fuel oil as the primary fuel:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.20	06-096 CMR 140, BPT	-
PM <sub>10</sub>	0.20		-
NO <sub>x</sub>	0.40		Enforceable by State-only

<u>Pollutant</u>	<u>lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	12.96	06-096 CMR 140, BPT	Enforceable by State-only
PM <sub>10</sub>	12.96		
SO <sub>2</sub>	115.1		
NO <sub>x</sub>	26		
CO	2.2		
VOC	0.55		

Emissions from Boiler No. 5 shall not exceed the following when firing natural gas as the primary fuel [06-096 CMR 115, BPT]:

<u>Pollutant:</u>	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>
<u>Limit, lb/hr:</u>	0.47	0.47	0.04	9.7	5.2	0.34

**Compliance Testing [06-096 CMR 140] Enforceable by State-only**

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods or other methods as approved by the Department and in accordance with the following frequencies, unless otherwise directed by the Department:

<u>Pollutant</u>	<u>Unit of Standard</u>	<u>Compliance Method</u>	<u>Frequency</u>
PM	lb/MMBtu and lb/hr	40 CFR Part 60, App. A, Method 5	Dependent on #6 fuel oil use, as specified below
PM <sub>10</sub>		40 CFR Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO <sub>2</sub>	lb/hr	40 CFR Part 60, App. A, Method 6	As requested
NO <sub>x</sub>	lb/MMBtu and lb/hr	40 CFR Part 60, App. A, Method 7	Dependent on #6 fuel oil use, as specified below
CO	lb/hr	40 CFR Part 60, App. A, Method 10	As requested
VOC		40 CFR Part 60, App. A, Method 25 or 25A	

**E. Periodic Monitoring**

Huhtamaki shall comply with the following periodic monitoring requirements for Boiler #5:

1. **Fuel oil use:** Monitor and record the amount of fuel oil fired in Boiler #5 on a daily, monthly, and 12-month rolling total basis. [06-096 CMR 140, BPT]
2. **PM and NO<sub>x</sub> emissions testing:** Huhtamaki shall perform PM emissions testing on Boiler #5 firing #6 fuel oil within 12 months of firing #6 fuel oil in Boiler #5 for greater than 50% of the boiler's annual total heat input, on a 12-month rolling total basis.

Records shall be kept documenting the heat input to Boiler #5 from each fuel, the total heat input, and the percentage of the total heat input from #6 fuel oil for the previous 12-month period. These records shall be kept on a monthly and a 12-month rolling total basis. [06-096 CMR 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 14 DAY OF November, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maria Allen Robert Corne for  
PATRICIA W. AHO, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-416-70-D-R.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 2, 2014

Date of application acceptance: September 2, 2014

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

